IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MARIO SAFFORD,) 08 C 0621
)
Plaintiff,) Judge Kennelly
)
VS.)
) Magistrate Judge Masor
CITY OF CHICAGO, et al.,)
)
Defendants.)

AGREED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFFS' COMPLAINT

Defendant City of Chicago ("City"), by its attorney, Mara S. Georges, Corporation Counsel, respectfully moves this court for an extension of time to answer or otherwise plead in response to Plaintiff's complaint until April 7, 2008, and in support states:

- 1. Plaintiff filed his three-count complaint on January 29, 2008. The complaint alleges federal claims under 42 U.S.C. § 1983 and an Illinois state law claim against the City, two named Chicago Police officers and unknown Chicago Police officers.
- 2. Plaintiff's complaint and summons were served on the City on or about February 15, 2008. Counsel for the City received the complaint and summons on March 21, 2008, approximately two weeks after the City was due to answer or plead in response to Plaintiff's complaint.
- 3. Because of this delay in receiving the complaint, the City has not yet begun the process of investigating all of the allegations in the Plaintiff's complaint and gathering and examining the pertinent records.

- 4. Therefore, counsel for the City requests until April 7, 2008, to answer or otherwise plead in response to the complaint.
- 5. As far as can be determined, this motion will not unduly burden the Court's management schedule. This request is made not to delay the proceedings, but rather to allow the City to respond properly to the allegations in Plaintiff's complaint.
 - 6. Plaintiff's counsel has stated that he does not object to this motion.

WHEREFORE, the City respectfully requests this court to enter an order granting an extension to April 7, 2008, to answer or otherwise plead in response to Plaintiff's complaint.

Respectfully submitted,

MARA S. GEORGES Corporation Counsel of the City of Chicago

By: /s/ Megan K. McGrath
Megan K. McGrath
Assistant Corporation Counsel

30 North LaSalle Street, Suite 1020 Chicago, Illinois 60602 (312) 744-8369 Attorney No. 06288408